

Attachment F SAE Burden Narrative

Estimate of the Information Collection Burden for State Agency Administrative Expense Funds – 7 CFR Part 235 (OMB Control Number 0584- 0067)

REPORTING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SAs)

1. Sections 235.5(b)&(c) require each SA to submit to FNS for approval an initial State Administrative Expense (SAE) plan and any amendments. FNS estimates that 83 SAs and alternate SAs will each file one report approximately every 3 years (0.361), as substantive changes occur to their base SAE plan, for an average of 30 responses per year. The estimated average number of burden hours per response is 8 hours resulting in an estimated total annual burden hours of 240 ($30 \times 8 = 240$). There is no change in burden.
2. Section 235.5(d) requires each SA to annually submit to FNS a State Administrative Expense Funds Reallocation Report (FNS-525) on the use of SAE funds. FNS estimates that 83 SAs and alternate SAs will each file 1 report annually for a total of 83 responses. The estimated average number of burden hours per response is 2 hours for 23 SAs receiving reallocated funds and 15 minutes (0.25 hours) for 60 SAs not requesting reallocated funds resulting in an estimated total annual burden hours of 61 ($(23 \times 2 = 46) + (60 \times 0.25 = 15) = 61$). There is no change in burden.
3. **Section 235.7(b) requires each SA to submit an annual report containing information on School Food Authorities under agreement with the State agency to participate in the National School Lunch or Commodity School programs. FNS estimates that 55 SAs will each file 1 report annually for a total of 55 responses. The estimated average number of burden hours per response is 1 hour resulting in an estimated total annual burden hours of 55 ($55 \times 1 = 55$). While working on this reinstatement, FNS obtained information that two NSLP agencies in Arkansas were combined into one agency. This decreased the number of respondents for this requirement from 56 to 55 (it does not, however, reduce the total respondents for this collection). The reduction in respondents in turn reduced the number of responses and burden hours for this requirement from 56 to 55. Therefore, the responses and burden hours for this requirement have been reduced by one due to an administrative adjustment.**

Activities removed since prior approval / or with this submission:

FNS has learned that two NSLP agencies within one state have merged into a single agency, which reduces the number of responses and burden hours under 235.7(b).

RECORDKEEPING REQUIREMENTS

AFFECTED PUBLIC: STATE AGENCIES (SA)

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- 1. Section 235.7(a) requires each SA to keep records on the expenditure of State administrative expense (SAE) funds and maintain current accounting records which shall adequately identify fund authorizations, obligations, unobligated balances, assets, liabilities, outlays and income. (Includes funds carried over into subsequent FY.) FNS estimates that 83 SAs will each file one report in a year on *reallocated* SAE funds for a total of 83 responses, with an estimated average of 2 hours per record, for a total of 166 burden hours. FNS estimates that 23 SAs will each file 26 reports in a year on *allocated* SAE funds for a total of 598 responses, with an estimated average of 2 hours per record, for a total of 1,196 burden hours. FNS estimates that 67 SAs and alternate SAs will each file 1 report annually on *carryover* SAE funds for a total of 67 responses, with an estimated average of 2 hours per record, for a total of 134 burden hours. The total number of responses is 748 and the estimated total burden hours is 1,496. For the recordkeeping requirement concerning the reallocated SAE funds (FNS-525), FNS determined that the frequency of the responses should be 1 rather than 26 as the agency estimated in previous submissions. The change in the frequency reduced the responses from 2,158 to 83 responses. In turn, this decreased the burden hours from 4,316 to 166 hours. The change in frequency decreased the responses for the collection by 2,075 responses and the burden hours by 4,150 hours due to an administrative adjustment.**
2. Sections 235.9(c) and (d) require the SA to comply with 2 CFR part 200 regarding procurement procedures and utilization and disposition of property acquired with SAE funds. FNS estimates that there are 83 SAs that will file one record annually for a total of 83 records. The estimated average number of burden hours per record is 3 hours resulting in an estimated total annual burden hours of 249 hours ($83 \times 3 = 249$). There is no change in burden.
3. Section 235.11(a) requires SAs to identify and document expenditure of funds from State sources in any fiscal year for the administration of CNP is not less than that expended or obligated in that fiscal year. FNS estimates that there are 54 SAs that will each file 4 records annually for a total of 216 records, with an estimated average of 15 minutes (0.25 hours) per record, and an estimated total annual burden hours of 54 hours ($216 \times 0.25 = 54$). There is no change in burden.

Changes made for FY2025 renewal:

State agencies' number of responses per recordkeeper has been reduced from 26 to one as a result of administrative adjustments to the recordkeeping requirements associated with 235.7(a), which decreased from 26 to 1 due to the discovery of an error in the previously approved frequency. This decrease resulted in the removal of 2,075 responses and 4,150 burden hours for this requirement.